

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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**AFFIRMATION OF ROBERT T. HAEFELE TRANSMITTING DOCUMENTS AND  
EVIDENCE IN OPPOSITION TO THE RENEWED MOTION TO DISMISS OF  
NATIONAL COMMERCIAL BANK**

Robert T. Haefele, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and associated with the law firm Motley Rice LLC. I submit this Affirmation to transmit to the Court the following documents and evidence submitted in Opposition to the Renewed Motion to Dismiss of National Commercial Bank.
2. Exhibit “A” to this Affirmation is Plaintiffs’ Factual Averment Supporting Plaintiffs’ Theories of Specific Jurisdiction as to National Commercial Bank, and with the accompanying Attorney Declaration identifying and attaching thereto true and correct copies of Exhibits 1 through 79.<sup>1</sup>
3. Exhibit “B” to this Affirmation is the Affirmation of Robert T. Haefele in Support of Plaintiffs’ Request for Discovery Relevant to Plaintiffs’ Theories of General Jurisdiction as to National Commercial Bank.
4. Affirmed in Mount Pleasant, South Carolina, on April 23, 2010.

/S/  
Robert T. Haefele, Esquire

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<sup>1</sup> Given the volume of the Exhibits to Plaintiffs’ Factual Averment, those Exhibits are being submitted to the Court on a CD, in accordance with the April 20, 2010 Stipulation between the parties.